

1 Honorable Jamal N. Whitehead
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 CRISTIAN NAVARRETE, an individual,

11 Plaintiff,

12 v.

13 CITY OF KENT, a municipal corporation
14 and, JAMES SHERWOOD, and his
15 marital community,

16 Defendants.

17 No. 2:22-cv-01431-JNW

18 STIPULATED MOTION TO CONTINUE
19 CASE SCHEDULE

20 NOTE ON MOTION CALENDAR:
21 August 19, 2024

22 **STIPULATION**

23 The parties jointly request that the Court continue the case schedule by
approximately six months, setting a new trial date of August 11, 2025, and continue the
discovery-related deadlines by 30 days. As discussed below, there is good cause for
continuing the trial date and related deadlines.

This request is due to lead defense counsel Nikki Carsley's upcoming maternity
leave. She is pregnant and due in mid-November. She plans on being on leave for four
months and will need 30 days to prepare dispositive and expert motions upon her

1 return. Given the inherent uncertainty of when her leave will begin and end, a trial date
 2 in August 2025 is the earliest feasible.

3 Ms. Carsley works at a small firm with one other fulltime attorney and one
 4 parttime attorney. The other attorneys do not have the capacity to take over this case,
 5 especially considering the heavier workload they will shoulder from losing her
 6 assistance on other matters during her leave. It is also the clients' preference that Ms.
 7 Carsley continue handling this matter, even though it will necessitate a continuance.

8 Additionally, the Plaintiff requests and the Defendants do not oppose a 30-day
 9 continuance of the discovery-related deadlines.

10 Therefore, the parties request a new trial date of August 11, 2025, and a
 11 continuance of the other remaining deadlines as follows:

Event	Current Deadline	Proposed New Deadline
Deadline for filing motions related to discovery	August 21, 2024	September 20, 2024
Discovery completed by	September 20, 2024	October 21, 2024
Deadline for filing dispositive motions and motions challenging expert-witness testimony	October 21, 2024	April 14, 2025
Settlement conference under LCR 39.1, if requested by the parties, held no later than	December 19, 2024	June 12, 2025
All motions <i>in limine</i> must be filed by	January 8, 2025	July 2, 2025
Deposition designations must be submitted by	January 27, 2025	July 21, 2025
Agreed pretrial order due	January 27, 2025	July 21, 2025

Event	Current Deadline	Proposed New Deadline
Trial briefs, proposed <i>voir dire</i> questions, and proposed jury instructions must be filed by	February 3, 2025	July 28, 2025
Pretrial conference	February 10, 2025	August 4, 2025
Jury trial begins	February 18, 2025	August 11, 2025

6 DATED: August 26, 2024
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THE BLANKENSHIP LAW FIRM, PLLC
9 Attorneys for Plaintiff

SEAMARK LAW GROUP PLLC
10 Attorneys for the City of Kent
11 and Officer Sherwood

12 s/Tobin Klusty (per authorization)
13 Scott Blankenship, WSBA No. 21431
14 Tobin Klusty, WSBA No. 52567
15 The Blankenship Law Firm, PLLC
16 1000 2nd Ave, Ste 3250
17 Seattle, WA 98104
18 (206) 343-2700
19 sblankenship@blankenshiplawfirm.com
20 tklusty@blankenshiplawfirm.com

21 s/Nikki Carsley
22 Geoff Grindeland, WSBA No. 35798
23 Nikki Carsley, WSBA No. 46650
24 Seamount Law Group PLLC
25 400 Winslow Way E, Ste 230
26 Bainbridge Island, WA 98110
27 (206) 502-2510
28 geoff@seamountlaw.com
29 nikki@seamountlaw.com

ORDER

Pursuant to the parties' stipulation, it is so ordered. The Court will not grant any further continuances in this case.

DATED: August 26, 2024

Jamal W
Jamal N. Whitehead
United States District Judge

CERTIFICATE OF SERVICE

I certify that on the date below I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Attorneys for Plaintiff

I further certify that on the date below I mailed by U.S. Postal Service a copy of the foregoing document to the following non-CM/ECF participants:

N/A

DATED: August 26, 2024

s/Nikki Carsley

Nikki Carsley

STIPULATED MOTION TO CONTINUE CASE
SCHEDULE (No. 2:22-cv-01431-JNW) - 5

SEAMARK LAW GROUP PLLC
400 WINSLOW WAY E, STE 230
BAINBRIDGE ISLAND, WA 98110
(206) 502-2510